

**ALLACCESS LAW GROUP**

Irene Karbelashvili, State Bar Number 232223

[irene@allaccesslawgroup.com](mailto:irene@allaccesslawgroup.com)

Irakli Karbelashvili, State Bar Number 302971

[irakli@allaccesslawgroup.com](mailto:irakli@allaccesslawgroup.com)

1400 Coleman Ave Ste F28

Santa Clara, CA 95050

Telephone: (408) 295-0137

Fax: (408) 295-0142

Attorneys for JOHN RODGERS, Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

<hr/>		)	Case No. 19-cv-06314-DMR
		)	
JOHN RODGERS,		)	<b>STIPULATION AND <del>[PROPOSED]</del></b>
Plaintiff,		)	<b>ORDER DISMISSING ACTION</b>
		)	<b>WITH PREJUDICE</b>
vs.		)	
		)	
BGD CORP., a California corporation dba		)	
BOMBAY GARDEN INDIA CUISINE;		)	
VERNE D. HELM and JENNY LOUIE-		)	
HELM in their individual capacity and		)	
representative capacity as Trustees of the		)	
LOUIE-HELM LIVING TRUST; and		)	
DOES 1-10, Inclusive,		)	
		)	
Defendants.		)	
<hr/>		)	

Plaintiff JOHN RODGERS and Defendants BGD CORP., a California corporation dba BOMBAY GARDEN INDIA CUISINE; and JENNY LOUIE-HELM in her individual capacity and representative capacity as Trustee of the LOUIE-HELM LIVING TRUST, stipulate and request pursuant to Fed. R. Civ. P. 41(a)(2) that this action be dismissed in its entirety with prejudice with plaintiff bearing his own attorney fees, costs, and litigation expenses and BGD CORP., a California corporation dba BOMBAY GARDEN INDIA CUISINE bearing attorney fees, costs and litigation expenses of all the defendants. The parties request that the Court retain jurisdiction over their settlement agreement in accordance with General Order No. 56.

Respectfully submitted,

Dated: June 17, 2020

/s/ Irakli Karbelashvili

Irakli Karbelashvili, Attorney for Plaintiff  
JOHN RODGERS

Dated: June 17, 2020

Sara Allman

Sara Allman, Attorney for Defendant  
JENNY LOUIE-HELM, Trustee

Dated: June 17, 2020

/s/ Bruce Neilson

Bruce Neilson, Attorney for Defendant  
BGD CORP

**Filer's Attestation**

I, Irakli Karbelashvili, attest that I received concurrence from the signatories in the filing of this document.

/s/ Irakli Karbelashvili

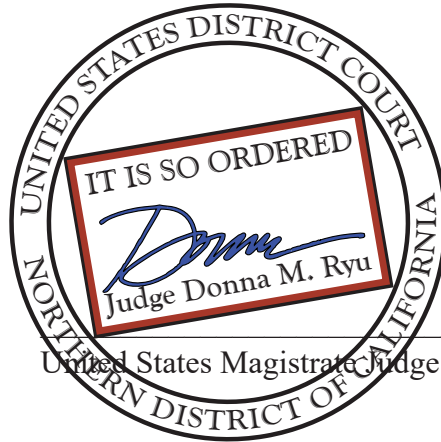
Irakli Karbelashvili

**~~PROPOSED~~ ORDER**

Having reviewed the parties' stipulation, and good cause appearing, this action is dismissed in its entirety with prejudice with plaintiff bearing his own attorney fees, costs, and litigation expenses and BGD CORP., a California corporation dba BOMBAY GARDEN INDIA CUISINE bearing the attorney fees, costs and litigation expenses of the all the defendants. The Court retains jurisdiction over the parties' settlement agreement. The Clerk shall close the case file.

**IT IS SO ORDERED.**

Date: June 22, 2020



United States Magistrate Judge